

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

In re:

LeClairRyan PLLC,

Debtor.

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

v.

ULX Partners, LLC, UnitedLex Corporation,
and ULX Manager, LLC,

Defendants.

Chapter 7

Case No. 19-34574 (KRH)

Adv. Proc. No. 20-03142 (KRH)

NOTICE OF MOTION AND HEARING THEREON

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee (the “**Trustee**”), and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-captioned Chapter 7 case (the “**Case**”), by counsel, has filed the *Motion and Memorandum of Law for Entry of an Order (I) Approving (A) Judicially Mediated Settlement and (B) Compensation to Counsel Including an Improvident Payment Under Section 328(A); and (II) Granting Related Relief* (the “**Motion**”). A copy of the Motion is being filed under seal pending the Court’s ruling on the *ULX Partners, LLC’s, UnitedLex Corporation’s, and ULX Manager, LLC’s Motion to Seal Settlement Agreement and Related Documents, Information, and Hearings* [Dkt No. 207] (the “**Seal Motion**”), scheduled to be heard on May 25, 2022 at 11:00 am. Thereafter, the Motion will be served as provided in any Order addressing the Seal Motion. Furthermore, a copy of the Motion may be received by any Person (as defined by Section 101(41) of the Bankruptcy Code) holding a claim against the Estate evidenced by (i) a proof of claim, which claim is not otherwise subject to dispute pursuant to the Bankruptcy Code and/or the Bankruptcy Rules and/or (ii) an order of the Bankruptcy Court, only upon written receipt by Paula

Erika L. Morabito (VSB No. 44369)
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Special Counsel to Lynn L. Tavenner, Chapter 7 Trustee

S. Beran, Esquire at pberan@tb-lawfirm.com of a commitment of any Person to keep such Motion confidential.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss it with your attorney if you have one in this Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to pberan@tb-lawfirm.com or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then, by **June 1, 2022** (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter the appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT the Court will entertain the Motion at a hearing on **June 8, 2022, at 1:00 p.m.** (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge. This hearing will take place remotely through Zoom on the date and time scheduled herein.

Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJltc--rrz4jHfonPb6c3FARuCippfQvj4g>

Listen-only conference line:

Dial: 1-866-590-5055

Access Code: 4377075

Security Code: 6822

PLEASE TAKE FURTHER NOTICE THAT you should consult the Case Management Procedures before filing any written response.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Dated: May 18, 2022

Respectfully submitted,

/s/ Erika L. Morabito

Erika L. Morabito (VSB No. 44369)

Brittany J. Nelson (VSB No. 81734)

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*Special Counsel to Lynn L. Tavenner, the Chapter 7
Trustee of the Estate of LeClairRyan PLLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of May, 2022, a true and correct copy of the foregoing document was served via first class mail and/or electronic mail upon: (i) all parties and counsel requesting service via the Court's ECF system, (ii) the Office of the United States Trustee, (iii) the Defendants, (iv) the 20 largest unsecured creditors as listed on the Debtor's schedules, (v) the Service List as defined by the governing Case Management, (f) Foley & Lardner; and (g) all Persons identified in paragraph 4 of the FAO Procedures Order.

/s/ Erika L. Morabito

Erika L. Morabito

*Special Counsel to Lynn L. Tavenner, the Chapter 7
Trustee of the Estate of LeClairRyan PLLC*